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- and -

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PANIAGUA GROUP, INC., an
Illinois Corporation

Plaintiff,
v.

HOSPITALITY SPECIALISTS, LLC, a
New Jersey Limited Liability Company;
BUILDING SERVICE AND
HOSPITALITYSOLUTIONS, LLC, a New
Jersey Limited Liability Company;
BUILDING SERVICES SOLUTIONS, LLC,
a New Jersey Limited Liability Company;
and GREG CIRIGNANO, a New Jersey
resident, FLORENCE CIRIGNANO, a New
Jersey resident, and MICHAEL CATER, a
New Jersey resident, all d/b/a
BUILDING SERVICE HOSPITALITY
SPECIALIST.

Defendants.

Document Electronically Filed

Civil Action No. 1:11-cv-6003-JEI-AMD

**NOTICE OF MOTION FOR
ENTRY OF DEFAULT JUDGMENT**

TO: Andre A. Norwood, Esq.
Law Office of Andre Norwood
116 North 2nd Street, Suite 107
Camden, New Jersey 08102
856-964-4000 (telephone), 856-964-4700 (Fax)
Attorney for Remaining Defendants

PLEASE TAKE NOTICE, that upon the accompanying Affidavit of Jonathan T. Guldin, dated August 21, 2014, Affidavit of John N. Walker, Esq., dated August 14, 2014, Affidavit of Alfred Paniagua, dated August 15, 2014, Memorandum of Law, and all prior papers and proceedings heretofore had herein, Plaintiff Paniagua Group, Inc. (“Paniagua”), by its attorneys Clark Guldin and the Waveland Law Group, LLC, will move before Magistrate Judge Ann Marie Donio, Room 3B, Mitchell H. Cohen Federal Building, 4th and Cooper Streets, Camden, New Jersey, on September 15, 2014 at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order pursuant to Fed. R. Civ. P. 55(b) for entry of a Default Judgment against Defendants, Florence Cirignano and Michael Cater, and such other relief as the Court deems just and proper.

Dated: August 21, 2014

Respectfully submitted,
CLARK GULDIN
Attorneys for Plaintiff

By: /s/ Jonathan T. Guldin
Jonathan T. Guldin

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By: /s/ John N. Walker
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